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11 *Attorneys for Defendants*

12 **IN THE UNITED STATES DISTRICT COURT**  
13 **FOR THE DISTRICT OF ARIZONA**

14 Mussalina Muhaymin as Personal  
15 Representative of the Estate of  
16 Muhammad Abdul Muhaymin Jr.,

17 Plaintiff,

18 vs.

19 City of Phoenix, an Arizona Municipal  
20 Corporation; Antonio Tarango; Officer  
21 Oswald Grenier; Officer Kevin  
22 McGowan; Officer Jason Hobe; Officer  
23 Ronaldo Canilao; Officer David Head;  
24 Officer Susan Heimbinger; Officer James  
25 Clark; Officer Dennis Lerous; Officer  
26 Ryan Nielson; Officer Steven Wong; and  
Doe Supervisors 1-5,

Defendants.

Case No.: 17-cv-04565-PHX-SMB

**DEFENDANTS**  
**MOTION TO SEAL:**

- 1) **MOTION FOR SUMMARY JUDGMENT;**
- 2) **STATEMENT OF FACTS IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT; AND**
- 3) **EXHIBITS TO STATEMENT OF FACTS IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

Defendants City of Phoenix, Antonio Tarango, Officer Oswald Grenier, Officer Kevin McGowan, Officer Jason Hobel, Officer Ronaldo Canilao, Officer David Head, Officer Susan Heimbigner, Officer James Clark, Officer Dennis Leroux, Officer Ryan

1 Nielsen and Sergeant Steven Wong (collectively the “Phoenix Defendants”), respectfully  
2 request this Court seal:

- 3 1) Defendants’ Motion for Summary Judgment;  
4 2) Defendants’ Separate Statement of Facts in support of Motion for Summary  
5 Judgment; and  
6 3) All Exhibits to Defendants’ Separate Statement of Facts in support of Motion  
7 for Summary Judgment.

8 Phoenix Defendants’ make this Motion in good faith, as the Motion for Summary  
9 Judgment, Statement of Facts, and Exhibits, reference extensive confidential testimony and  
10 documents covered by this Court’s Protective Order entered on May 8, 2019 (*See* Dkt. No.  
11 072), with the majority of the Exhibits containing excerpts from confidential documents.  
12 *See also* Order dated June 5, 2020 at Dkt. No. 188; Sealed Order dated December 11, 2020  
13 at Dkt. No. 271.

14 Dated: December 17, 2020.

**O’CONNOR & DYET, P.C.**

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17 By: /s/ Karen J. Stillwell  
18 Daniel J. O’Connor, Jr.  
19 Karen J. Stillwell  
20 Travis B. Hill  
21 *Attorneys for Defendants*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 17, 2020, I electronically filed the foregoing with the Clerk of the Court for the U.S. District Court, District of Arizona, using the CM/ECF System. A Notice of Electronic Filing will be served to the following registered participants:

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By: /s/ Dara J. Wilson